UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 10**

1200 Sixth Avenue. Suite 900 Seattle, WA 98101-3140

> OFFICE OF **ENVIRONMENTAL CLEANUP**

D-R-A-F-T

Reply To

Attn Of: 222 W & 7thAvenue #19 Anchorage, AK 99513

Terrance W. Cundy Manager - Silviculture, Wildlife, and Environment Potlatch Forest Holdings, Inc. 530 S. Asbury, Suite 4 Moscow, Idaho 83843

RE: EPA Comments to the Draft Engineering Evaluation/Cost Analysis Report, Avery Landing Site, Avery, Idaho (dated 22 January 2010)

Dear Mr. Cundy:

Enclosed herewith are comments provided by the U.S. Environmental Protection Agency (EPA) to the above referenced draft EE/CA report.

Overall the draft EE/CA report omits several components and subcomponents necessary for ensuring that non-time-critical removal actions are conducted in accordance with applicable laws, regulations, and EPA policy. In particular, the EE/CA report did not provide definitive information on the source, nature, and extent of contamination; a streamlined risk evaluation focusing on specific threats to public health, welfare, or the environment; or identify and evaluate only the most qualified cleanup technologies based on the nature and extent of contamination and risks. The report must be substantially revised to meaningfully address these concerns and others as presented in the enclosed comments.

Although Potlatch has 25 calendar days from receipt of the enclosed comments to provide EPA with a final proposed EE/CA report, EPA prefers to know in advance of that submission whether Potlatch intends to provide a report which will be modified in a manner that incorporates all EPA comments. Given the vast amount of revision which is needed to produce a report which will be acceptable to EPA, if, for any reason, such a revised report will not be forthcoming, advanced notice of this outcome will allow EPA to proceed in a more timely manner with actions deemed necessary for cleanup of the Site. In that regard, I request that you let me know within 15 calendar days of receipt of this letter whether Potlatch intends to produce a timely final proposed EE/CA report which incorporates all EPA comments.

Please contact me with any questions you have regarding this letter at 208/664-4858.

Sincerely,

Earl Liverman On-Scene Coordinator

Encl as

cc: Richard Mednick, EPA